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November 23, 2020

Hon. Stewart D. Aaron
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1970
New York, NY 10007

Re: *Liss v. Heritage Health & Housing, Inc*
Index No. 19-cv-4797 (LTS) (SDA)

Dear Judge Aaron:

We represent Plaintiff Jane Liss in the above-captioned action. We write to respectfully request an extension of Plaintiff's deadline to file her opposition to Defendant's motion for summary judgment, which is currently due on December 7, 2020. This is Plaintiff's first request for an extension of the December 7 deadline. Defendant consents to the request.

The extension request is necessitated by the family circumstances of undersigned Plaintiff's counsel. On November 19, 2020, I was informed by my son's daycare provider that it was temporarily closing and that he would have to quarantine for at least two weeks because he had been in prolonged close contact with someone in his class who tested positive for COVID-19. During this two-week period, I will be responsible for the bulk of childcare duties because a medical condition places my partner at a heightened risk of developing serious symptoms if she contracts COVID-19. As a result, I will have to take off or work only reduced hours during this time.

If the Court grants this request, the parties propose the following schedule for the remaining briefing on Defendant's motion for summary judgment:

- December 28, 2020 – Plaintiff's opposition due.
- January 26, 2020 – Defendant's reply due.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/Lucas C. Buzzard
Lucas C. Buzzard